UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

John W. Weiss Leah M. Eisenberg David E. Sklar

PASHMAN STEIN WALDER HAYDEN, P.C.

21 Main Street, Suite 200 Hackensack, New Jersey 07601 Telephone: (201) 270-5477 Email: jweiss@pashmanstein.com

leisenberg@pashmanstein.com dsklar@pashmanstein.com

-and-

Joaquin M. C de Baca (admitted *pro hac vice*) Richard A. Stieglitz (admitted *pro hac vice*) Youmi Kim (admitted *pro hac vice*)

MAYER BROWN LLP

1221 Avenue of the Americas New York, New York 10020-1001 Telephone: (212) 506-2500

Email: jcdebaca@mayerbrown.com rstieglitz@mayerbrown.com ykim@mayerbrown.com

Counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, and (3) DTE Electric Company

In Re:

POWIN, LLC, et al.,1

Debtors.

Chapter 11

Case Number: 25-16137 (MBK)

Jointly Administered

The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583], (ii) Powin, LLC [0504], (iii) PEOS Holdings, LLC [5476], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487], (x) Powin Energy Storage 2, Inc. [9926], (xi) Powin Energy Ontario Storage II LP [5787], and (xii) Powin Canada B.C. Ltd. [2239]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

CERTIFICATE OF NO OBJECTION REGARDING MOTION FOR ENTRY OF AN ORDER AUTHORIZING LICENSEES TO REDACT AND FILE UNDER SEAL CONFIDENTIAL INFORMATION CONTAINED IN THE ENERGY SUPPLY AGREEMENTS AND LONG-TERM SERVICES AGREEMENTS IN CONNECTION WITH LICENSEES' MOTION TO COMPEL

PLEASE TAKE NOTICE that, undersigned hereby certifies that, as of the date hereof, counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, and (3) DTE Electric Company (collectively, the "Licensees") has received no answer, objection or other responsive pleading to the *Motion for Entry of an Order Authorizing Licensees to Redact and File Under Seal Confidential Information Contained in the Energy Supply Agreements and Long-Term Services Agreements in Connection with Licensees' Motion to Compel [D.I. 118] (the "Motion to Seal") filed on June 21, 2025.*

PLEASE TAKE FURTHER NOTICE that pursuant to the *Notice of Hearing on the Motion to Compel* [D.I. 183], objections to the Motion to Seal were to be filed and served no later than July 8, 2025. On July 14, 2025, the Licensees, by and through counsel, filed an adjournment request, which adjourned the hearing date on the Motion to Seal to August 6, 2025. The undersigned further certifies that the Licensees' counsel has caused a review of the Court's docket in the above captioned chapter 11 cases and that no response, objection or other responsive pleading to the Motion to Seal appears thereon.

PLEASE TAKE FURTHER NOTICE that a clean version of the proposed order approving the relief requested in the Motion on a final basis (the "<u>Proposed Final Order</u>") is attached hereto as **Exhibit "A"**. A redline comparing the Proposed Final Order to the proposed

order originally submitted with the Motion to Seal is attached hereto as **Exhibit "B"**. The Licensees respectfully request that the Court enter the Proposed Final Order.

Dated: August 1, 2025 Respectfully submitted,

/s/ Leah M. Eisenberg

John W. Weiss Leah M. Eisenberg David E. Sklar

PASHMAN STEIN WALDER HAYDEN, P.C.

21 Main Street, Suite 200 Hackensack, New Jersey 07601 Telephone: (201) 270-5477

Email: jweiss@pashmanstein.com leisenberg@pashmanstein.com dsklar@pashmanstein.com

-and-

Joaquin C de Baca (admitted *pro hac vice*) Richard A. Stieglitz (admitted *pro hac vice*) Youmi Kim (admitted *pro hac vice*)

MAYER BROWN LLP

1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 506-2500 Facsimile: (212) 262-1910

Email: jcdebaca@mayerbrown.com rstieglitz@mayerbrown.com ykim@mayerbrown.com

Counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, and (3) DTE Electric Company